1 Jennifer L. Keller, SBN 84412 ikeller@kelleranderle.com 2 Nahal Kazemi, SBN 322026 nkazemi@kelleranderle.com 3 KELLER/ANDERLE LLP 18300 Von Karman Avenue, Suite 930 4 Irvine, CA 92612 5 T: (949) 476-8700 F: (949) 476-0900 6 Kimberly Hall Barlow, SBN 149902 7 kimberly.barlow@costamesaca.gov 8 77 Fair Drive Costa Mesa, CA 92626 9 T: (714) 754-5000 10 Attorneys for Plaintiffs, CITY OF COSTA MESA and KATRINA FOLEY 11 12 UNITED STATES DISTRICT COURT 13 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION 14 15 CITY OF COSTA MESA and Case No. 8:20-cy-00368-JLS-JDE KATRINA FOLEY, 16 **DECLARATION OF NAHAL** Plaintiffs, 17 KAZEMI IN SUPPORT OF THE **PARTIES' JOINT STATUS** 18 VS. **REPORT** 19 UNITED STATES OF AMERICA, THE DEPARTMENT OF HEALTH 20 AND HUMAN SERVICES, THE UNITED STATES DEPARTMENT OF 21 DEFENSE, THE UNITED STATES AIR FORCE, THE CENTERS FOR 22 DISEASE CONTROL AND 23 PREVENTION, THE STATE OF CALIFORNIA, FAIRVIEW 24 DEVELOPMENTAL CENTER (FAIRVIEW), THE CALIFORNIA 25 **GOVERNOR'S OFFICE OF** 26 EMERGENCY SERVICES, and THE CALIFORNIA DEPARTMENT OF 27 **GENERAL SERVICES** Defendants. 28

I, Nahal Kazemi, declare as follows:

- 1. I am senior counsel at Keller/Anderle LLP, counsel of record for Plaintiffs City of Costa Mesa and Katrina Foley *in City of Costa Mesa and Katrina Foley vs. United States, et al.* I have personal knowledge of the information stated below and could testify to it under oath.
- 2. Attached as **Exhibit 1** is a true and correct copy of the County and City's questions posed to Defendants and related attachments on February 25, 2020, as ordered by this Court.
- 3. Attached as **Exhibit 2** is a true and correct copy of the Agenda circulated by the County of Orange for the February 27, 2020 meeting among the Parties and the County of Orange.
- 4. Attached as **Exhibit 3** is a true and correct copy of the CDC's Interim Guidance for Implementing Home Care of People Not Requiring Hospitalization for 2019 Novel Coronavirus (2019-nCoV); downloaded from: https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-home-care.html.
- 5. Attached as **Exhibit 4** is a true and correct copy of the CDC's transmission protocols, including droplet protocols. Downloaded from: https://www.cdc.gov/infectioncontrol/basics/transmission-based-precautions.html#anchor 1564058155.

I declare under penalty of perjury that the foregoing is true and correct to the best of knowledge and recollection.

Executed on February 28, 2020.

 /s/ Nahal Kazemi	
Nahal Kazemi	